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November 18, 1987

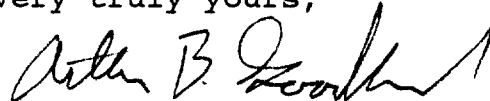
William J. Tricarico, Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Mr. Tricarico:

Transmitted herewith, on behalf of Great American Broadcasting Company, McGraw-Hill Broadcasting Company, Inc. and The New York Times Company are an original and eleven copies of their Joint Comments in MM Docket No. 87-268, pertaining to advanced television systems.

In the event there are any questions concerning this matter, please contact this office.

Very truly yours,



Arthur B. Goodkind

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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact on the)
Existing Television Broadcast)
Service)
)
Review of Technical and)
Operational Requirements:)
Part 73-E, Television)
Broadcast Stations)
)
Reevaluation of the UHF)
Television Channel and)
Distance Separation)
Requirements of Part 73 of)
the Commission's Rules)

MM Docket No. 87-268 / RM-5811

For Action By: The Commission

JOINT COMMENTS OF GREAT AMERICAN BROADCASTING COMPANY,
MCGRAW-HILL BROADCASTING COMPANY, INC., AND
THE NEW YORK TIMES COMPANY

Great American Broadcasting Company, McGraw-Hill Broadcasting Company, Inc. and The New York Times Company (hereinafter jointly referred to as "Respondents"), file herewith, by their attorneys, their Joint Comments in response to the above-captioned Notice of Inquiry.

Directly or through wholly-owned subsidiaries, each of the Respondents is the licensee of several television broadcast stations. Each of the Respondents is also a member of both the National Association of Broadcasters and the Association of Maximum Service Telecasters, both of which are today filing

detailed Comments in this proceeding. Respondents support the position taken in those Comments. We seek here to emphasize only one critical point, namely, the need to avoid premature action with respect to reallocation of UHF frequencies, changes in television interference protection standards, or related allocation issues.

(1) The present period of development for advanced television systems of all kinds is one of extraordinary ferment. While it is clear that the future will bring vast improvements in the technical quality of television reception for American consumers, the way in which these improvements will come is not clear at all. It is possible, for example, that a first step to significant improvements may be a new generation of NTSC transmitters and receivers that can provide materially better reception quality than is presently available, with a later, second step being required to produce "true" high definition television (HDTV) comparable to the MUSE system soon to be made available in this country in VCR form by Japanese manufacturers. On the other hand, it may prove possible to move in a single step to "true" HDTV that would concurrently be receivable as such on a new generation of HDTV receivers, while still being receivable at the present NTSC quality level by existing NTSC receivers.

In short, the precise future course of HDTV development remains uncertain. What is made clear, however, in the Comments

being filed today by AMST and NAB is that a number of mutually incompatible systems are now undergoing simultaneous development, and that the technical parameters of the system or systems that will ultimately be selected for broadcast use in this country cannot realistically be known or knowable for two or three more years.

(2) Any true HDTV system ultimately selected for broadcast use in the United States must fulfill two bedrock requirements. First, it must be transmittable by terrestrial broadcasters, either over existing 6 MHz television channels or through use of additional frequency space sufficiently modest that the potential allocation of such frequencies to broadcasters is a realistic possibility. Any system that fails to meet this requirement would simply consign free, over-the-air television broadcasting to permanent second class status, a result contrary to the public interest. Second, any form of broadcast HDTV selected must be receivable on television sets now in existence in the United States, even if such reception by pre-existing sets is at today's NTSC level of quality. Failure to meet that requirement would render almost 200 million existing television sets useless as to all HDTV transmissions.

(3) While several new developments in NTSC transmission and reception promise substantial improvements in the quality of television reception now available to consumers without use of frequency space beyond the six MHz channels presently used

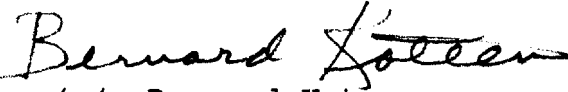
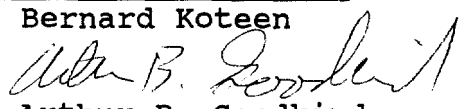
by terrestrial broadcasters, no system thus far believed possible would permit the transmission of "true HDTV" without use of additional frequency space. It is therefore essential that maximum flexibility be preserved to permit some form of terrestrial HDTV that uses such additional frequencies. Given the present early stage of work on systems that can be used by terrestrial broadcasters and still be compatible with existing receivers, it appears extremely unlikely that there can be any near term determination of the additional frequency needs of terrestrial HDTV. Accordingly, Respondents strongly urge the Commission to take no frequency allocation actions now that could foreclose the possibility of terrestrial HDTV broadcasting in the future.

It would be similarly premature for the Commission to act now to modify television interference protection standards, to change UHF "taboos," to modify present NTSC standards, to adopt a system of "flexible allocation" of existing television frequencies, or to consider any system involving the trading of interference rights in the marketplace. Until the technical parameters of an over-the-air HDTV system are developed and agreed upon and until extensive system testing is accomplished, it will be impossible to gauge the impact of such changes on future HDTV development. None should be considered further until the future requirements of HDTV broadcasting are known.

In sum, Respondents strongly urge the Commission to take no action now that would be inconsistent with an orderly transition from our present system of television broadcasting to a new system in which free, over-the-air broadcasters can participate fully in the transmission of HDTV. By "orderly transition," Respondents mean specifically a transition similar to the change from black and white to color, with today's 200 million television sets remaining fully useful until they are gradually replaced by a new generation of improved receivers with HDTV capacity.

Respectfully submitted

GREAT AMERICAN BROADCASTING COMPANY
MCGRAW-HILL BROADCASTING COMPANY, INC.
THE NEW YORK TIMES COMPANY


By /s/ Bernard Koteen
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